REMARKS

This is in response to the Office Action dated May 17, 2007. Claims 1-9 are currently pending.

Claim 1 stands rejected under Section 103(a) as being allegedly unpatentable over Matsuzaki in view of Johnson. This new Section 103(a) rejection is respectfully traversed for at least the following reasons.

Claim 1 for example calls for a managing method for ordering a composition of a plurality of units to form a *composite apparatus which is a copying machine, a facsimile machine, a printing machine, or a composite machine comprising multiple of said machines, through an ordering apparatus* and for managing said ordered composite apparatus, the method comprising causing said ordering apparatus to receive unit information for *specifying units constituting an actual composite apparatus, which is the copying machine, the facsimile machine, the printing machine, or the composite machine comprising multiple of said machines . . . causing said composite apparatus, when said actual composite apparatus is actually set up by actual units and the power is switched on, to recognize unit information for specifying actual units to be actually composed itself, and create composite state information for specifying a composite state of actual units based on the recognized unit information, according to the same rule as said predetermined rule.*"

Matsuzaki fails to disclose or suggest the above italicized features of claim 1. Matsuzaki relates to a system for a toy plane, and has nothing to do with ordering a copying machine, a facsimile machine, a printing machine, or a composite machine comprising multiple of said machines, through an ordering apparatus as recited in claim 1. Recognizing this flaw in Matsuzaki, the Office Action cites to Johnson.

Claim 1 has been amended (as have the other claims) to make clear that the claim is referring to an actual composite apparatus which is actually set up by actual units. In Matsuzaki, what is made by an actual unit is an actual toy plane. Claim 1 requires causing said actual composite apparatus to recognize unit information for specifying actual units to be actually composed itself. That is, according to claim 1, the actual composite apparatus exists and itself actually recognizes actual unit information which specifies units making up itself – this feature is not disclosed or suggested in any of the cited art. The toy plane of Matsuzaki does not itself actually recognizes actual unit information which specifies units making up itself. Thus, the Examiner's position is inappropriate and the rejection should be withdrawn. The rejection is fundamentally flawed. The other claims define over the cited art in a similar manner.

Moreover, Johnson and Matsuzaki are entirely unrelated and deal with drastically different subject matters and are not properly combinable. They are non-analogous. Matsuzaki relates to a manufacturing system which accepts custom orders for products such as toy planes. On the other hand, Johnson relates to a proposal preparation system for selling computer equipment. The two references are non-analogous and are not properly combinable under Section 103(a). There is no suggestion or motivation in the cited art for the alleged combination. Hindsight is not permitted.

Moreover, claim 1 has been clarified to require that the composite apparatus recognizes unit information for specifying units to be composed itself, and create composite state information for specifying a composite state of units based on the recognized unit information, according to the same rule as said predetermined rule, *when said composite apparatus is set up and the power is switched on*. E.g., see pg. 21, lines 1-10. The cited art cannot possibly disclose

or suggest these features, especially being performed when the composite apparatus is set up and the power is turned on as required by amended claim 1.

Additionally, *both* Matsuzaki and Johnson fail to disclose or suggest (a) causing said actual composite apparatus (which is the copying machine, the facsimile machine, the printing machine, or the composite machine comprising multiple of said machines) to *inform the composite state information to said ordering apparatus*; and (b) *comparing the composite state information created by said ordering apparatus and the composite state information informed by said composite apparatus*, as required by claim 1. Nothing in Matsuzaki or Johnson discloses or suggests these features of claim 1. Thus, even the alleged combination of the two references fails to meet the claim in these respects.

Johnson appears to disclose selecting parts and assembling thereof on a monitor display, which is a simulation for so-called BTO. On the other hand, the Examiner has admitted that Matsuzaki's toy plane is not a composite apparatus. However, the Examiner contends that composite state information is compared between "an ordering department" and "a designing department" of Matsuzaki. Applying these contentions to claim 1, the order for units constituting the designing department should be received by the ordering department. However, it is apparent that in Matsuzaki the receiving department does not receive an order for units constituting the designing department, by an order for units constituting a toy plane.

On the other hand, claim 1 requires causing said composite apparatus to recognize unit information for specifying units to be composed itself. That is, according to claim 1, the actual composite apparatus exists and itself recognizes unit information which specifies units making up itself – this feature is not disclosed or suggested in any of the cited art. Thus, the Examiner's

position is inappropriate and the rejection should be withdrawn. The rejection is fundamentally flawed.

If one were to assume that the toy plane of Matsuzaki does not constitute a composite apparatus as alleged by the Examiner, then according to the Examiner the design department would be constituted in accordance with the order received by the ordering department – this clearly does not occur in Matsuzaki. That is, in Matsuzaki, the ordering department does not receive an order for units constituting the design department, but instead receives orders for units constituting toy planes.

Accordingly, if the composite apparatus in Matsuzaki is the toy plane (most appropriate), then the cited art does not meet the claim at least because the actual toy plane itself in Matsuzaki does not recognize unit information which specifies actual units actually making up the toy plane. On the other hand, if the toy plane is not the composite apparatus in Matsuzaki (less appropriate) as alleged by the Examiner (and the design department is a composite apparatus as alleged by the Examiner), then the claim cannot possibly be met because the design department is not constituted in accordance with the order received by the ordering department.

For the reasons set forth above, the Section 103(a) rejection of claim 1 is fundamentally flawed and should be withdrawn.

Other Claims

Because the alleged combination of the two references is legally flawed, the Section 103(a) rejections of claims 1-9 are flawed and should be withdrawn.

Additionally, all pending claims require that a particular function(s) is performed *when said actual composite apparatus is actually set up by actual units and the power is switched on.* The cited art fails to disclose or suggest this, either taken alone or in the alleged combination.

Furthermore, regarding claim 4, both Matsuzaki and Johnson fail to disclose or suggest *means for comparing the transmitted composite state information and the composite state information corresponding to the composite apparatus information stored by said storing means* as required by claim 4. Because both references fail to disclose or suggest this feature, even the alleged combination fails to meet the invention of claim 4 in this respect.

Regarding claim 5, both Matsuzaki and Johnson fail to disclose or suggest *means for comparing the composite state information transmitted from said ordering apparatus and the composite state information transmitted from said composite apparatus* as required by claim 5. Because both references fail to disclose or suggest this feature, even the alleged combination fails to meet the invention of claim 5 in this respect.

Furthermore, regarding claim 7, both Matsuzaki and Johnson fail to disclose or suggest *comparing received composite state information and the composite state information stored in said storing means* as required by claim 7. Because both references fail to disclose or suggest this feature, even the alleged combination fails to meet the invention of claim 7 in this respect.

Additionally, regarding claims 8-9, these claims also require *comparing received composite state information and the stored composite state information*. Again, both Matsuzaki and Johnson fail to disclose or suggest this feature of claims 8-9. Because both references fail to disclose or suggest this feature, even the alleged combination fails to meet the invention of claims 8-9 in this respect.

It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

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